

EXHIBIT 15

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.;

3:17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

_____ /

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

CONTINUED VIDEOTAPED DEPOSITION OF

RHIAN MORGAN, VOLUME III

WEDNESDAY, OCTOBER 4, 2017

Reported by:

Anrae Wimberley

CSR No. 7778

Job No. 2720767

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09:40:34

1 Q. Ms. Morgan, do you recognize the facility
2 that is photographed in this document?

3 A. I do.

4 Q. What is it?

5 A. It's Shred Works.

09:40:39

6 Q. Who would you deal with when you went to
7 Shred Works?

8 A. Who would I deal with, as in who would do
9 my shredding or --

10 Q. Do you remember the names of the employees
11 who would conduct the shredding for you at Shred
12 Works?

09:40:56

13 A. Yes, there's a woman at the front desk
14 named Princessa, who would usually take my payment,
15 depending on who was working. I was -- recalled in
16 the e-mail, that I believe we produced to you
17 yesterday, that this guy Ricardo would usually be
18 in -- inside of the actual -- like the machine is
19 through this door right here, and he would be the
20 one usually there to shred the stuff for me.

09:41:07

09:41:25

21 MS. McKESSAR: For the record, the witness is
22 pointing to page 1 in the photograph on the
23 right-hand side of the exhibit that is marked as
24 8401.

25 BY MS. McKESSAR:

09:41:40

09:41:44

1 Q. Is it normal in your everyday life to know
2 people by their first name?

3 MS. DEARBORN: Objection to form.

4 BY MS. McKESSAR:

5 Q. That you --

09:41:50

6 A. Yeah. I mean, I work with people, right.
7 So it's -- it's valuable to my work to know people's
8 names.

9 Q. If someone performs a service for you
10 three or four times, is it ordinary for you to
11 remember their name?

09:42:06

12 A. Totally depends on the context.

13 Q. When you made payment to Princessa at
14 Shred Works, did she issue you with a receipt?

15 MS. DEARBORN: Objection to form.

09:42:30

16 THE WITNESS: Yes.

17 BY MS. McKESSAR:

18 Q. What did you do with those receipts?

19 A. Probably threw them away.

20 Q. Why would you throw those receipts away?

09:42:42

21 A. Do you keep every receipt? I don't keep
22 every receipt that I use once I had reimbursed
23 myself or had Anthony reimburse me. I didn't think
24 I'd ever need them again.

25 Q. So before you threw those receipts away,

09:42:56

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09:42:58

1 you first showed them to Anthony Levandowski for
2 reimbursement purposes; is that correct?

3 MS. DEARBORN: Objection to form.

4 THE WITNESS: I don't recall. And I don't
5 think I showed him any receipts. He trusts me to
6 say, Hey, you owe me 50 bucks, and that was that.

09:43:05

7 BY MS. McKESSAR:

8 Q. So you have not provided any receipts from
9 Shred Works to counsel in this case; is that
10 correct?

09:43:16

11 MS. DEARBORN: Objection to form.

12 THE WITNESS: I provided one that I found in my
13 house.

14 BY MS. McKESSAR:

15 Q. Do you remember the date of that receipt?

09:43:27

16 A. That the receipt was generated or that I
17 provided it to counsel?

18 Q. The date that the receipt was generated.

19 A. I don't remember.

20 Q. Do you remember the date that you provided
21 that receipt to counsel?

09:43:41

22 MS. DEARBORN: You can say the date.

23 THE WITNESS: I don't remember.

24 BY MS. McKESSAR:

25 Q. Can you estimate how long ago that was?

09:43:47

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09:43:50

1 A. I don't remember.

2 Q. Was it months, weeks, days?

3 A. Maybe two months ago.

4 Q. What was the highest amount of money that

5 you ever paid in cash at Shred Works?

09:44:06

6 A. I don't recall.

7 Q. Can you give me an estimate, if it was in

8 the thousands or the hundreds or even less?

9 A. Probably hundreds.

10 Q. When would you use your credit card as

09:44:20

11 opposed to cash to pay at Shred Works?

12 A. If I had gone to get cash or not gone to

13 get cash.

14 Q. What was the highest amount that you can

15 recall placing on your credit card for shredding at

09:44:33

16 Shred Works?

17 A. I don't recall.

18 Q. Can you give me an estimate if it was in

19 the thousands or the hundreds?

20 A. Hundreds. Maybe 100.

09:44:44

21 Q. Would you sign the receipt that Shred

22 Works provided you?

23 MS. DEARBORN: Objection to form.

24 THE WITNESS: I believe so.

25 BY MS. McKESSAR:

09:45:06

FEDERAL CERTIFICATE OF DEPOSITION OFFICER

I, ANRAE WIMBERLEY, CSR NO. 7778, do hereby
declare:

That, prior to being examined, the witness
named in the foregoing deposition was by me duly
sworn pursuant to Section 30(f)(1) of the Federal
Rules of Civil Procedure and the deposition is a
true record of the testimony given by the witness;

That said deposition was taken down by me in
shorthand at the time and place therein named and
thereafter reduced to text under my direction;

----- That the witness was requested to
review the transcript and make any changes to the
transcript as a result of that review pursuant to
Section 30(e) of the Federal Rules of Civil
Procedure;

----- No changes have been provided by the
witness during the period allowed;

----- The changes made by the witness are
appended to the transcript;

--X--- No request was made that the
transcript be reviewed pursuant to Section 30(e) of
the Federal Rules of Civil Procedure.

I further declare that I have no interest in
the event of the action.

I declare under penalty of perjury under the
laws of the United States of America that the
foregoing is true and correct.

WITNESS my hand this 5th day of October, 2017.



ANRAE WIMBERLEY, CSR NO. 7778